



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

February 15, 2018

Ms. Allison Wells Gritton
Wooden, McGlaughlin LLP
211 North Pennsylvania Street
One Indiana Square, Suite 1800
Indianapolis IN, 46204

Dear Ms. Wells Gritton:

Re: **Further Site Investigation**

Reed Manufacturing Inc.
1056 Eastview Drive
Former Houghland Tomato Factory
1130 Eastview Drive
Franklin, Johnson County
State Cleanup Site #20133456 and #201342015

The Indiana Department of Environmental Management (IDEM) has reviewed the *Further Site Investigation Reports* (FSI), prepared and submitted by Patriot Engineering and Environmental and Ramboll. The FSIs were submitted in response to a release of hazardous substances at the the former Houghland Tomato Factory located at 1130 Eastview Drive in Franklin, Johnson County, Indiana (Site). The FSIs are available in IDEM's virtual file cabinet (VFC) as document numbers 80541345 and 80541328. The VFC is located on IDEM's website at <https://vfc.idem.in.gov/DocumentSearch.aspx>.

The documents were evaluated based on IDEM's *Remediation Closure Guide* (RCG) and *Remediation Program Guide* (RPG) guidance manuals and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW846) Third Edition, Update III. Based on the data submitted, an additional FSI must be performed. The following IDEM comments must be addressed in the future FSI Report and field activities:

Comments

1. Trichloroethylene (TCE) was detected in groundwater collected from monitoring wells MW-11, MW-22, MW-26, MW-31, and MW-32. Based on the easterly groundwater flow at the Site, TCE is not delineated. Since chlorinated volatile organic compounds (cVOCs) are the contaminant of concern (COC), vertical delineation is still needed. One deep monitoring well (MW-1D) was installed up-gradient of the suspected source area. Groundwater samples collected were non-detect for all Site related COCs. Additional deep monitoring wells must be paired with monitoring wells MW-11, MW-15, MW-22,



A State that Works

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MW-26, and MW-29. Additional shallow wells are also needed east and south of monitoring well MW-15.

The screened intervals for the deep wells must be extended until a fine grained unit is encountered or cVOC concentrations drop below applicable screening levels. A gray moist stiff clay was encountered from 26 feet below ground service (bgs) to the bottom of the boring at 35 feet bgs in boring PB-40 (MW-31) and from 32 feet bgs to the bottom of the boring at 38 feet bgs in boring PB-41 (MW-32). Additional deep monitoring wells need to have the bottom of the screens set in the clay unit. In addition soil samples of the clay are necessary to evaluate the possibility of the clay acting as a secondary source.

2. TCE and tetrachloroethene (PCE) in groundwater exceeded groundwater screening levels (GWSL) and vapor intrusion groundwater screening levels (VIGWSL) on the southwestern and central portions of the Houghland Property and the southeastern portion of the Reed property. The highest TCE and PCE concentrations in groundwater (monitoring well MW-30) were immediately east and down-gradient of the wooded area in front of the two properties. TCE and PCE concentrations decrease with distance from the wooded area. A source is present near the wooded area.
3. IDEM agrees that soil contamination is characterized. IDEM does not agree that groundwater contamination is characterized. CVOC contamination is not delineated horizontally or vertically.

Conclusions

IDEM agrees that soil contamination is characterized. IDEM does not agree that groundwater contamination is characterized. cVOC contamination is not delineated horizontally or vertically to the east and south. Additional paired deep wells are required per comment number 1.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the Further Site Investigation to IDEM within 90 days of the date of this letter in accordance with IDEM Office of Land Quality document submittal guidelines, which are available online at <http://www.in.gov/idem/landquality/2368.htm>, to the following address:

Indiana Department of Environmental Management
Office of Land Quality
State Cleanup Section, Attn: Tim Johnson
100 N. Senate Ave., IGCN, Room 1101
Indianapolis, IN 46204-2251

See Attachment A for procedures to resolve technical disagreements utilizing IDEM's Technical Review Panel.

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If you have any questions or comments concerning this matter, please contact me at (317) 234-3931, or you may call IDEM's toll free number at (800) 451-6027 and ask for Tim Johnson.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Johnson", with a stylized, cursive script.

Tim Johnson
State Cleanup Section
Office of Land Quality

TRJ:sb

cc: IDEM Site #201334567

IDEM Site #201342015

Mr. Chuck Goodwin Ramboll

Mr. Mike Casper, Patriot Engineering and Environmental
Johnson County Health Department

Attachment A: Technical Review Panel Announcement

ATTACHMENT A
Technical Review Panel Announcement

Technical Review Panel

IDEM's Office of Land Quality Announces New Technical Review Panel for VRP and State Cleanup Program Technical Disputes

During the course of some remediation projects, technical disagreements between the Indiana Department of Environmental Management (IDEM) staff and external entities arise. We recognize that these disputes can often cause delays and frustration on both sides of the issue. Therefore, the IDEM has developed a mechanism for settling technical disagreements called the Technical Review Panel (Panel). The IDEM assembled a pool of approximately 12 IDEM scientists from outside the Office of Land Quality (OLQ) each having expertise applicable to the technical issues we commonly encounter. When the Panel is needed we will assemble a small group of those scientists with the appropriate expertise to help settle the dispute.

We envision the basic process to be as follows: If the IDEM project manager and the external party cannot agree on a technical issue within a reasonable time, the IDEM project manager will elevate the dispute to their Remediation Branch managers and senior Science Service technical staff for review. If the dispute is still not settled, the external party may contact the Remediation Services Branch Chief directly and request the issue be reviewed by the Panel. Each side will provide the Panel a short written summary of their technical view point prior to participating in an informal discussion with the Panel. The Panel will then provide written recommendations.

The Technical Review Panel is a pilot and at this time will only be used for disputes between our State Cleanup Program and/or the Voluntary Remediation Program (VRP) project managers and external parties.

Note: Any decision produced by the Technical Review Panel is not an agency action as defined in IC § 4-21.5-1-4 or an order as defined in IC §4-21.5-1-9. This decision is not subject to administrative review because it is not a determination of any legal rights, duties, privileges, immunities, or other legal interests, and because it is issued pursuant to an informal procedure for dispute resolution as allowed by IC 4-21.5-3-34 (a).

Our goal is to enable remediation sites to move forward in a timely manner and to provide external entities a forum outside the OLQ to help resolve technical disagreements with the VRP and State Cleanup Program project managers.

This review process is available immediately. If you would like to request a review by the Panel, please contact the Remediation Services Branch at (317) 232-4535 or scp@idem.in.gov.

Source: <http://www.in.gov/idem/landquality/2504.htm>